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December 10, 2008

Leah R. Revelle
Environmental Engineer
Virginia Department of Environmental Quality
South Central Regional Office
7705 Timberlake Road
Lynchburg, VA 24502

RE: Cox Wood of Virginia
VPDES Permit # VA0081213
VPDES Permit Renewal Application

Dear Ms. Revelle:

Enclosed, please find the Cox Wood of Virginia's VPDES permit renewal application. The permit expires September 20, 2009.

Four Years of Samplings results have been included in this renewal application package.

- The Reverse Osmosis unit Outfall 001 results are located behind **EPA Form 3510-2C**
- The Storm Water Sampling Outfall 901 are located behind **EPA Form 3510-2F**
- The five Monitoring Well Sampling results are located in their own section

Outfall 001, Reverse Osmosis (RO) Unit – Monthly sampling of the RO unit for four years indicate that the unit is running well and staying within the rationale Limits. Average Sampling results from 2005 through 2008 have been lower than the permit rationale limits with the exception of *Dissolved Oxygen*. Dissolved Oxygen levels were higher during 2005 and 2006, but have stabilized and averaged 3.41 mg/L since 2007.

	Rational Limits	2005-2008 Average	2007-2008 Average
Total Dissolved Solids	800 mg/l	472	
pH	6.0-9.0	7.0	
Chlorides	860 mg/l	27	
Dissolved Oxygen	4.0-5.0 mg/l	5.0	3.41
(47 samples pulled since 2005)			

With four years of monthly sampling data, Cox Wood of Virginia believes that sampling of the outfall 001 should be reduced to two times annually for the contaminants previously sampled monthly, along with a one-time sampling of the dissolved metals during the next permit phase.

Ground Water Monitoring Wells – The five (5) monitoring wells are currently sampled quarterly for the following constituents:

- Static Water Level
- Dissolved Arsenic
- Dissolved Copper
- pH
- Dissolved Chromium
- Total Organic Carbon (TOC)

Sampling results from 2005 – 2008 (4 years) indicate minimal to below detection Limit (BDL) for all wells but MW#3, which is the down gradient well since the shallow ground water flows generally in a southwest direction. Even the results of MW#3 are extremely low. There was one sampling exception for arsenic in August, 2008 at 300 ug/l, but it is believed to be an anomaly as the previous and post samplings show low results. *See Section on Monitoring Well Sampling Results.*

With four years of quarterly sampling data, Cox Wood of Virginia believes that sampling of the five monitoring wells should be reduced to one time annually for the contaminants previously sampled.

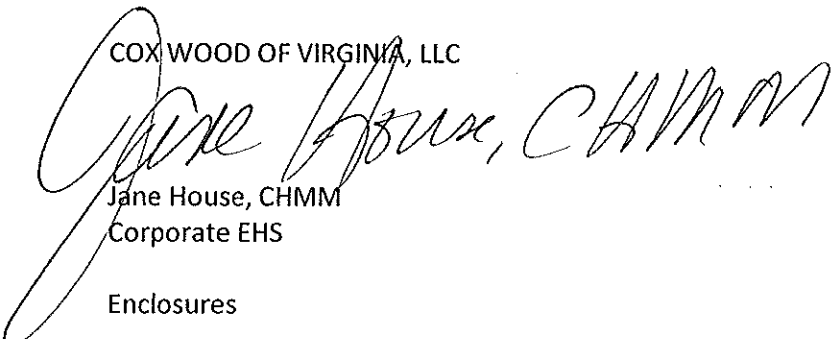
We have also included a second laboratory for analytical and the *Ceriodaphnia dubia* Toxicity Screening starting in 2009. Shealy Environmental Services procedures for toxicity screening are included in the O & M manual.

With this application, Cox Wood of Virginia would also like to request a sampling waiver for select analytical under ***EPA Form 3510-2C and 3510-2F***. The waiver request is attached with this letter.

If you have any questions or require more information, please contact me at (803) 664-4014.

Sincerely,

COX WOOD OF VIRGINIA, LLC



Jane House, CHMM
Corporate EHS

Enclosures

COX WOOD OF VIRGINIA, LLC
PERMIT # VA0081213
SAMPLING WAIVER REQUEST FOR EPA FORMS -2C AND 2F

EPA Form 3510-2C

Cox Wood of Virginia's outfall 001 information related to this form is for a reverse osmosis (RO) unit. This unit is used exclusively to provide ultra filtration to well water and has no contact with any effluent or production wastewater stream. Since it is not associated with any type of waste stream, the chemical testing requirements under 2C should not apply.

Starting in January, 2005, the waste stream from the RO unit has been tested monthly for *Total Dissolved Solids, pH, Chlorides, and Dissolved Oxygen*. During that four year period, the waste stream was also tested for Dissolved metals on the RCRA list as well as metals related to previous and current wood preservatives in use at the facility.

EPA FORM 3510-2F

Cox Wood of Virginia has been sampling the pollutants required by the State permit. This permit was based upon previous samplings and the rationale determined that the current sampling regime is sufficient to determine the effectiveness of the permit program. Testing has been performed Quarterly.